

Eileen S. Stommes, Deputy Administrator
USDA-AMS-TM-NOP
Docket #TMD-94-00-2
Room 4007-South
Ag Stop 0275
P.O. Box 96456
Washington D.C. 20090-6456

Dear Eileen S. Stommes,

I welcome strong and healthy national standards for organic foods and have recently become aware of the U.S. Department of Agriculture's attempt to redefine organic foods. For me, the security of the word "organic" is threatened by the proposal released on December 16, 1997. "Organic" food means that the food is: free of toxic metals, pesticides and other chemicals; free of radioactive contamination; free of animals suffering inhumane treatment; grown from naturally occurring seed. When I choose food that is labeled "organic" I expect a pure product, grown or prepared in a wholesome manner with concern for the highest level of safety. The U.S.D.A.'s definition of "organic" destroys that for me, and I absolutely oppose it. I urge that a federal organic standard be modeled after California's stringent code which does NOT include:

- *Genetic Engineering-Using genetic engineering to produce foods
- *Factory Farming-Using inhumane, intensive confinement, factory farm style production methods on farm animals
- *Animal Cannibalism-Feeding back diseased and waste animal body parts, offal and blood to farm animals, the practice that has led to Mad Cow Disease in Europe
- *Food Irradiation-Using radioactive nuclear wastes to "kill bacteria" in order to prolong the shelf life of food products which destroys some of its nutritive value

The current "organic" codes of 17 U.S. states, 33 private certifying agencies, and Europe's "biological" food label clearly restrict all the above practices and consider them non-organic and non-biological. I consider the U.S.D.A.'s proposal misleading to consumers. It represents an "open season" for corporate agribusiness, chemical-biotech corporations and giant supermarket chains; it amounts to nothing less than a hostile takeover of the success of the organic industry by industrialized agriculture interests hoping for short term monetary gain. The proposed rule makes the concept of "organic" essentially meaningless, and assures that greed and environmental degradation will continue to triumph over intelligent and sustainable use of our land and care for our bodies.

I also oppose the new U.S.D.A. rules that would deny states and localities from setting tougher organic food standards without first being approved by the U.S.D.A.. I agree with many industry experts who are skeptical that the U.S.D.A. would allow stricter local standards, since stricter organic standards represent an implicit, if not explicit, condemnation of current unsustainable agricultural practices.

In fact, the U.S.D.A.'s rules are a direct affront to the National Organic Standards Board (NOSB)-composed of industry representatives, farmers, environmentalists and food processors. The NOSB, established by the Organic Food Production Act in 1990, made recommendations to the U.S.D.A. that explicitly banned genetically engineered foods, irradiation, farming with sewage sludge and intensive factory farm style animal husbandry practices.

The National Organic Program Proposed Rule, as written, is an unlawful implementation of the Organic Foods Production Act of 1990. The Proposed Rule is at variance with the Act generally and specifically, in creating new definitions and policies, and in allowing materials and substances that are now unacceptable for organic production. I propose that future organic standards follow the recommendations of the organic sector, especially from the National Organic Standards Board.